

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
LAFAYETTE DIVISION**

|  |   |                          |
|--|---|--------------------------|
| <b>DAVID GOODRICH,</b>                 | ) | <b>Case No.</b>          |
|  | ) |                          |
| <b>Plaintiff,</b>                      | ) | <b>Judge</b>             |
|  | ) |                          |
| <b>v.</b>                              | ) |                          |
|  | ) |                          |
| <b>QUEST GLOBAL SERVICES-NA, INC.,</b> | ) | <b>NOTICE OF REMOVAL</b> |
|  | ) |                          |
| <b>Defendant.</b>                      | ) |                          |

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Pursuant to 28 U.S.C. §§ 1331, 1441(a), and 1446, Defendant QuEST Global Services-N.A., Inc. (“QuEST”) removes Cause No. 79C01-2010-PL-000133, filed in the Tippecanoe County, Indiana Circuit Court, to the United States District Court for the Northern District of Indiana. By filing this Notice of Removal, QuEST does not intend to waive, and specifically reserves, any objection as to service, personal jurisdiction, and all other defenses. The grounds for the removal are:

1.     State Court Action. On October 15, 2020, Plaintiff David Goodrich (“Goodrich”) filed this employment discrimination action against his former employer, QuEST, in the Circuit Court for Tippecanoe County, Indiana, captioned *David Goodrich v. QuEST Global Services-NA, Inc.*, bearing cause number 79C01-2010-PL-000133 (the “Complaint”). Pursuant to 28 U.S.C. § 1446(a), copies of the Complaint and Summons, which were served on QuEST on or about December 7, 2020, are attached as Exhibits 1 and 2, respectively. Other than documents attached as Exhibits 1 and 2, there are no other pleadings, papers, or motions filed in this action to date.

2.     Federal Jurisdiction. The Complaint asserts a claim for employment discrimination under the federal Age Discrimination in Employment Act (“ADEA”), 29 U.S.C. §§ 621 *et seq.* (See Compl., Ex. 1, at ¶¶ 19-20). Because Goodrich’s Complaint asserts claims arising under

federal law, this Court has original jurisdiction over those claims pursuant to 28 U.S.C. § 1331, and removal is proper under 28 U.S.C. § 1441(a).

3. Timeliness. Removal is timely under 28 U.S.C. § 1446(b)(3) because QuEST filed this Notice of Removal within thirty (30) days of receipt of the Complaint through service of process.

4. Venue. Plaintiff brought this action in the Circuit Court for Tippecanoe County, Indiana, and venue is proper in this Court under 28 U.S.C. §§ 1441(a) and 1446(a).

5. Notice. Promptly upon filing this Notice of Removal with this Court, QuEST will give written notice of this removal to Plaintiff, and will also file a copy of this Notice with the Tippecanoe County, Indiana Circuit Court.

Accordingly, Defendant QuEST Global Services-N.A., Inc. requests that this Court assume jurisdiction over this case and issue such further orders as may be necessary and appropriate.

Respectfully submitted,

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*Counsel for Defendant*  
*QuEST Global Services-N.A., Inc.*

**CERTIFICATE OF SERVICE**

I certify that on December 23, 2020, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send notification to all attorneys and/or parties of record, and via email to the following:

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/s/ Eric S. Clark

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